

[counsel on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**JOINT MOTION FOR ENTRY OF
PROPOSED STIPULATED ORDER RE:
DISCOVERY OF ELECTRONICALLY
STORED INFORMATION**

Plaintiffs Richard Kadrey, Sarah Silverman, Christopher Golden, Michael Chabon, Ta-Nehisi Coates, Junot Díaz, Andrew Sean Greer, David Henry Hwang, Matthew Klam, Laura Lippman, Rachel Louise Snyder, Ayelet Waldman, Jacqueline Woodson, and the proposed class (collectively, “Plaintiffs”) and Defendant Meta Platforms, Inc. (“Meta” or “Defendant”) (collectively, the “Parties”) have negotiated the terms of a [Proposed] Stipulated Order Re: Discovery of Electronically Stored Information, attached as Exhibit A, memorialized by the signatures on page 17 (“Proposed Order”). In light of this agreed-upon protocol, the Parties respectfully request that the Court enter the Proposed Order.

Dated: April 9, 2024

JOSEPH SAVERI LAW FIRM, LLP

By: /s/ Joseph R. Saveri
Joseph R. Saveri

Joseph R. Saveri (State Bar No. 130064)
Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Holden Benon (State Bar No. 325847)
Aaron Cera (State Bar No. 351163)
JOSEPH SAVERI LAW FIRM, LLP
601 California Street, Suite 1505
San Francisco, CA 94108
Telephone: (415) 500-6800
Facsimile: (415) 395-9940
Email: jsaveri@saverilawfirm.com
czirpoli@saverilawfirm.com
cyoung@saverilawfirm.com
hbenon@saverilawfirm.com
acera@saverilawfirm.com

Matthew Butterick (State Bar No. 250953)
1920 Hillhurst Avenue, #406
Los Angeles, CA 90027
Telephone: (323) 968-2632
Facsimile: (415) 395-9940
Email: mb@buttericklaw.com

Counsel for Kadrey Plaintiffs and the Proposed Class

Dated: April 9, 2024

CAFFERTY CLOBES MERIWETHER &
SPRENGEL LLP

By: /s/ Bryan L. Clobes
Bryan L. Clobes

Bryan L. Clobes (admitted *pro hac vice*)
**CAFFERTY CLOBES MERIWETHER
& SPRENGEL LLP**
205 N. Monroe Street
Media, PA 19063
Telephone: (215) 864-2800
Email: bclobes@caffertyclobes.com

Alexander J. Sweatman (*pro hac vice anticipated*)
**CAFFERTY CLOBES MERIWETHER
& SPRENGEL LLP**
135 South LaSalle Street, Suite 3210
Chicago, IL 60603
Telephone: (312) 782-4880
Email: asweatman@caffertyclobes.com

Daniel J. Muller (State Bar No. 193396)
VENTURA HERSHEY & MULLER, LLP
1506 Hamilton Avenue
San Jose, CA 95125
Telephone: (408) 512-3022
Facsimile: (408) 512-3023
Email: dmuller@venturahersey.com

Counsel for Chabon Plaintiffs and the Proposed Class

Dated: April 9, 2024

COOLEY LLP

By: /s/ Bobby Ghajar
Bobby Ghajar

Bobby Ghajar (State Bar No. 198719)
Colette Ghazarian (State Bar No. 322235)

COOLEY LLP

1333 2nd Street, Suite 400
Santa Monica, CA 90401
Telephone: (310) 883-6400
Facsimile: (310) 883-6500
Email: bghajar@cooley.com
cghazarian@cooley.com

Mark Weinstein (State Bar No. 193043)
Judd Lauter (State Bar No. 290945)

COOLEY LLP

3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
Facsimile: (650) 849-7400
Email: mweinstein@cooley.com
jlauter@cooley.com

Mark A. Lemley (State Bar No. 155830)

LEX LUMINA PLLC

745 Fifth Avenue, Suite 500
New York, NY 10151
Telephone: (646) 898-2055
Facsimile: (646) 906-8657
Email: mlemley@lex-lumina.com

Attorneys for Defendant
META PLATFORMS, INC.

SIGNATURE ATTESTATION

As the ECF user whose user ID and password are utilized in the filing of this document, I attest under penalty of perjury that concurrence in the filing of the document has been obtained from each of the other signatories.

Dated: April 9, 2024

By: /s/ Joseph R. Saveri
Joseph R. Saveri